EPA Jacket 88602-2

Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

July 29, 2014

OVERNIGHT DELIVERY

Meredith F. Laws, Chief
Insecticide-Rodenticide Branch
Registration Division (7505P)
Document Processing Desk (FNL LBL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Prodigy Technical Holdings, LLC

Diflubenzuron Technical (EPA Reg. No. 88602-2)

Submission of Final Printed Label

Dear Mr. Gebken,

On behalf of Prodigy Technical Holdings, LLC, we are submitting the final printed label for Diflubenzuron Technical. The following documents are enclosed:

- 1. Application for Pesticide Registration (EPA Form 8570-1)
- 2. Two (2) Copies of the Proposed Labeling
- 3. Letter of Authorization

We trust you will find this application complete. However, please feel free to contact me ((253) 853-7369, Ann@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,

Ann M. Tillman

Please read instructions o	n reverse before comple	ting form.	Form Ap	proved	OMB No. 2	2070-006	Approval expires 2-28-95
\$EPA	Environmenta	Inited States I Protection Ageington, DC 20460	эпсу	✓	Registra Amendr Other		OPP Identifier Number
		Application for	Pesticide - Sec	tion	I		
1. Company/Product Num Prodigy Technical Ho		2	2. EPA Product Mer J. Hebert	ager			prosed Classification
4. Company/Product (Nam Prodigy Technical Hold	•	n Technical	PM#	07			None
5. Name and Address of A Prodigy Technical Hold 4110 136th St. NW Glg Harbor, WA 98332	applicant <i>(Include ZIP Co</i> ings, LLC c/o Pyxis Reg	-		is simi	ilar or ident	ical in co	FIFRA Section 3(c)(3) mposition and labeling
Check if t	his is a new address		Product Name				
		Sec	tion - II				
Amendment - Expl Resubmission in re Notification - Expla	sponse to Agency letter		Agency let "Me Too" Other - Exp	ter date Applica	ition.	to Jul	y 10, 2014
Submission of Final I							
		Sec	tion - III				
1. Meterial This Product V	Vill Be Peckaged in:						
Child-Resistant Packaging Yes No	Unit Packaging Yes No	No. per If "Ye	Yes No No, per	···	2. Type of	Metal Plastic Glass Paper	lined fiber drum
 Certification must be submitted 	Unit Packaging wgt.		ge wgt containe	r	7	Other (9	
3. Location of Net Conten	ls Information	4. Size(s) Retail Conta	iner		cation of Lab	el Directio	Ua
✓ Label	Container	25	kg	<u> </u>	On Labeling	ассопрепу	ng product
8. Manner in Which Label		Lithograph Paper glued Stenciled	Othe	·			···· <u>·</u> ······
		Sect	tion - IV				· · · · · · · · · · · · · · · · · · ·
1. Contact Point (Comple	te items directly below :	for identification of indiv	idual to be contacted,	if nece	easery, to pr	ocess this	application.)
Name Ann M. Tillman		Titla				Telephone (253) 8:	No. (include Agas Code)
		Agent			I	,, -	03-7309
	any knowlinglly false or	Certification This form and all attact misleading statement m				mplete.	6. Date Application Received (Stamped)
i acknowledge that both under applicab	any knowlinglly false or	Certification This form and all attack misleading statement m				mplete.	6. Date Application Received
i acknowledge that both under applicab	any knowlinglly false or le law.	Certification This form and all attack misleading statement m		ine or i		mplete.	6. Date Application Received

DIFLUBENZURON TECHNICAL

For Use Only in the Manufacturing of Insect Growth Regulator Products

ACTIVE INGREDIENT:

Diflubenzuron: [N-[[(4-chlorophenyl)amino]carbonyl]-2,6-difluorobenzamide]......98.6% OTHER INGREDIENTS: 1.4% TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

IF ON SKIN OR CLOTHING •	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
•	Call a poison control center or doctor for treatment advice.
IF IN EYES •	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide concerns), you may call SAFETYCALL INTERNATIONAL at 1-866-897-8050 (independent veterinarians and pharmacists on staff twenty-four (24) hours, seven (7) days per week).

For Chemical Emergency ONLY (spill, leak, fire, exposure or accident), call CHEMTREC at 1-800-424-9300.

EPA Reg. No.: 88602-2

EPA Est. No.:

Manufactured for:

Prodigy Technical Holdings, LLC 500 E. Shore Dr., Suite 120 Eagle, Idaho 83616

Net Weight: XXX lbs.

NOT REVIEWED

In Accordance with PR Notice 82-2 Based on Draft Labeling Dated

07/10/14

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes and gloves and protective eyewear. Remove and wash contaminated clothing before reuse. ***

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. De-not discharge effluent containing this product to sewer systems without previously notifying the local-sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of law to use this product in a manner inconsistent with its labeling.

Read entire label before using this product.

Only for formulation into registered insect growth regulator formulations.

This product may be used to formulate products for any uses not listed on this label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such use(s).

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry area that is inaccessible to children and animals.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on-site or at

an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then offer drum and liner for recycling if available. If not available, dispose of liner in a sanitary landfill or by other procedures approved by State and local authorities. If burned stay out of smoke. If drum is contaminated and cannot be reused, dispose of in the same manner required for its liner.

LIMIATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of Prodigy Technical Holdings, LLC. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Prodigy Technical Holdings, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, neither Prodigy Technical Holdings, LLC, the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any end all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

Batch	Code:

[20140710]

DIFLUBENZURON TECHNICAL

For Use Only in the Manufacturing of Insect Growth Regulator Products

ACTIVE INGREDIENT:

Diflubenzuron: [N-[[(4-chlorophenyl)amino]carbonyl]-2,6-difluorobenzamide]	98.6%
OTHER INGREDIENTS:	
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID						
 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. 						
IF IN EYES	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice. 					
	HOT LINE NUMBER					

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide concerns), you may call SAFETYCALL INTERNATIONAL at 1-866-897-8050 (independent veterinarians and pharmacists on staff twenty-four (24) hours, seven (7) days per week).

For Chemical Emergency ONLY (spill, leak, fire, exposure or accident), call CHEMTREC at 1-800-424-9300.

EPA Reg. No.: 88602-2

EPA Est. No.:

Manufactured for:

Prodigy Technical Holdings, LLC 500 E. Shore Dr., Suite 120 Eagle, Idaho 83616

Net Weight: XXX lbs.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes and gloves and protective eyewear. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or ether waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of law to use this product in a manner inconsistent with its labeling.

Read entire label before using this product.

Only for formulation into registered insect growth regulator formulations.

This product may be used to formulate products for any uses not listed on this label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such use(s).

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry area that is inaccessible to children and animals.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then offer drum and liner for recycling if available. If not available, dispose of liner in a sanitary landfill or by other procedures approved by State and local authorities. If burned stay out of smoke. If drum is contaminated and cannot be reused, dispose of in the same manner required for its liner.

LIMIATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of Prodigy Technical Holdings, LLC. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Prodigy Technical Holdings, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, neither Prodigy Technical Holdings, LLC, the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

Batch	Code:
[2014	07101

Prodigy Technical Holdings, LLC 4110 136th St. NW Gig Harbor, WA 98332 Tel: (253) 853-7369

May 23, 2011

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Prodigy Technical Holdings, LLC (EPA Company Number PENDING), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

William R. Marciniak

President

Prodigy Technical Holdings, LLC

William J. Maraniak

cc: Pyxis Regulatory Consulting, Inc.

DATA EXTRACTION REQUEST

Reg # 88402 -2	Decision #
Description:	
Material Sent:	
Electronic Label/Letter Date (See PPLS for electronic file)	
☐ Stamped Label Dated	(See jacket)
☐ Notification Dated	(See jacket)
☐ New CSF(s) Dated	(See jacket)
Other:	
File this coversheet and attached materials in to clipped together, NOT STAPLED. Then give the to staff in the Information Services Center (ISC available as an image, please file materials in a For further information please call 703-605-071	jacket with the coversheet and materials (Room S-4900). If a jacket is full or only new jacket and bring it down to the (ISC).
Reviewer: Autumn Metzger	
Division: RD - IRB	
Phone: 305-5314	
Date:	•



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505C) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

88602-2

Date of Issuance:

EPA Reg. Number:

July 10, 2014

١	1(\mathcal{C}	ГΙ	CE	0	F	PΕ	ST	ľ	CI	D	Ē	•

X Registration

Reregistration

(under FIFRA, as amended)

Term of Issuance: Conditional

Name of Pesticide Product:

Diflubenzuron Technical

Name and Address of Registrant (include ZIP Code):

Prodigy Technical Holdings, LLC 2813 Downing St.

Flower Mound, TX 75028

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A) provided that you:

- 1. Submit and/or cite all data required for registration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data. You must comply with GDCI-108201-1286 issued on 6/7/2013. If you have questions about the Generic DCI issued, you may contact Steven Snyderman from the Pesticide Re-evaluation Division.
- 2. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 88602-2"

Signature of Approving Official:

Date:

July 10, 2014

Meredith F. Laws, Chief

Insecticide-Rodenticide Branch, Registration Division (7505P)

Page 2 EPA Reg. No. 88602-2

- 3. Submit Storage stability (830.6317) and corrosion characteristics (830.6320) data within 18 months from the date of this registration notice.
- 4. Submit one copy of the revised final printed label for the record before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. If you have any questions, please contact Autumn Metzger at 703-305-5314 or metzger.autumn@epa.gov.

A stamped copy of the label is enclosed for your records.

Meredith F. Laws Chief, Insecticide-Rodenticide Branch Registration Division (7505P)

Enclosure

DIFLUBENZURON TECHNICAL

For Use Only in the Manufacturing of Insect Growth Regulator Products

ACTIVE INGREDIENT:

Diflubenzuron: [N-[[(4-chlorophenyl)amino]carbonyl]-2,6-difluorobenzamide]	 98.6%
OTHER INGREDIENTS:	 1.4%
TOTAL:	

KEEP OUT OF REACH OF CHILDREN CAUTION

ACCEPTED

07/10/2014

and Rodenticide Act as amended, for the esticide registered under EPA Reg. No. 88602-2

FIRST AID						
IF ON SKIN OR	Take off contaminated clothing.					
CLOTHING	Rinse skin immediately with plenty of water for 15-20 minutes.					
	Call a poison control center or doctor for treatment advice.					
IF IN EYES	Hold eye open and rinse slowly and gently with water for 15-20 minutes.					
	Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.					
	Call a poison control center or doctor for treatment advice.					
	HOT LINE NUMBER					

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies, or pesticide concerns), you may call SAFETYCALL INTERNATIONAL at 1-866-897-8050 (independent veterinarians and pharmacists on staff twenty-four (24) hours, seven (7) days per week).

For Chemical Emergency ONLY (spill, leak, fire, exposure or accident), call CHEMTREC at 1-800-424-9300.

EPA Reg. No.: 88602-E

EPA Est. No.:

Manufactured for:

Prodigy Technical Holdings, LLC 2813 Downing St. Flower Mound, TX 75028

Net Weight: XXX lbs.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wear long-sleeved shirt and long pants, socks. shoes and gloves and protective eyewear. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of law to use this product in a manner inconsistent with its labeling.

Read entire label before using this product.

Only for formulation into registered insect growth regulator formulations.

This product may be used to formulate products for any uses not listed on this label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding the support of such use(s).

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry area that is inaccessible to children and animals.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on-site or at

an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then offer drum and liner for recycling if available. If not available, dispose of liner in a sanitary landfill or by other procedures approved by State and local authorities. If burned stay out of smoke. If drum is contaminated and cannot be reused, dispose of in the same manner required for its liner.

LIMIATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of Prodigy Technical Holdings, LLC. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Prodigy Technical Holdings, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, neither Prodigy Technical Holdings, LLC, the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

Batch Code:

[20140708]

Product ingredient source information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

8Pm 7-01-14

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION OFFICE OF PESTICIDE PROGRAMS **REGISTRATION DIVISION (7505P)**

BARCODE: D417676; Reg No.: 88602-E; PRODUCT: Diffubenzuron Technical R334

DATE:

June 25, 2014

FROM:

Akiva Abramovitch, Ph.D.

Technical Review Branch / RD (7505P)

THROUGH: Shyam B. Mathur, Ph.D.

Product Chemistry Team Leader

Technical Review Branch/RD (7505P)

TO:

Autumn Metzger/Venus Eagle, Product Manager, RM 1

Insecticide-Rodenticide Branch / RD (7505P)

SUBJECT: Product Chemistry Review of Diflubenzuron Technical

DECISION NO.: 484943

PC CODE: 108201

REGISTRANT: Prodigy Technical Holding

USE: Technical

MRID NUMBERS: 492207-01 through -04

INTRODUCTION:

The registrant is seeking the registration of a new manufacturing use product of Diflubenzuron Technical. This product will be produced at . The active ingredient in this product is Diflubenzuron at a label nominal concentration of 98.6% a.i and an identical label claim. This product is intended for use in the manufacture of end-use products. In support of this petition, the registrant has submitted a draft label and product chemistry data contained in MRID# 492207-01 through -04 and a basic CSF dated July 31, 2013.

SUMMARY OF FINDINGS:

GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	492207-01	Α	
8301600	Description of materials used to produce the product	492207-01	Α	
830.1620	Description of production process	492207-01	Α	
830.1670	Discussion of formation of impurities	492207-01	Α	
830.1700	Preliminary analysis	492207-02	A	The NC of Al (98.6%) is supported by an analysis of 5 batches. Analysis agrees with the label claim NC.
830.1750	Certified limits	492207-01 492207-02	Α	
830.1800	Enforcement analytical method	492207-01 492207-02	Α	Validated HPLC and GC-MS with FID detector for quantification.

A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required

BARCODE: <u>D417676</u>; Reg No.: <u>88602-E</u>; PRODUCT: <u>Diflubenzuron Technical</u> R334

830 Series Subgroup B (Physical-Chemical Properties)

GLN	Requirement	MRID	Status	Result or Deficie	ency		
830.6302	Color	492207-03	Α	Off white			
830.6303	Physical state	492207-03	Α	Powder			
830.6304	Odor	492207-03	Α	Odorless			
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	492207-03	Α	Study at 54 C for two weeks indicated no degradation, discoloration or other physical change			
830.6314	Oxidation/reduction: chemical incompatibility	492207-03	.А		to be non-reactive towards iron NH4I-12P04, KMnO4 an kerosene.		
830.6315	Flammability	492207-03	.A.	Product is not fla	ammable.		
830.6316	Explodability	492207-03	.A .	Product does no	ot contain explosive components		
830.6317	Storage stability	492207-03	A	54 ± 2 ·c (Accelerated The test item is thermally stable for 14 days at 54 C			
830.6319	Miscibility	492207-04	W.	Product is not an EC nor mixed with petroleum solvents			
830.6320	Corrosion characteristics		G	.No data submitted			
830.7000	pH	492207-03	Α	6.98 at 26.68 C			
830.7050	UV/Visible absorption		Α	pH 6.91	log ε (204, 258 nm)=4.20, 4.04		
				pH 0.64	log e (257 nm)=4.09		
		_		pH 13.38	log s(257 nm)=4.09		
830.7100	Viscosity	492207-04	w	Solid,/ waiver			
830.7200	Melting point	492207-03	.A.	221.3 C			
830.7220	Boiling point		NA	Solid , waiver			
830.7300	Density	492207-03	A	1.56 gm/mi @ 20 °C			
830.7370	Dissociation constants in water	492207-03	Α	pKa=11.62			
830.7550	Partition coefficient	492207-03	Α	Log P o/w= 3.6			
830.7840	Water solubility:	492207-03	Α	0.57 mg/L at pH	7 at 20 C		
830.7950	Vapor pressure	492207-04	w				

Y = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade; U = Up-grade (additional information required

Product ingredient source information may be entitled to confidential treatment

Manufacturing process information may be entitled to confidential treatment

BARCODE: <u>D417676</u>; Reg No.: <u>88602-E</u>; PRODUCT: <u>Diflubenzuron Technical</u> R334

CONCLUSIONS:

TRB has reviewed this submission and reports the following findings:

- 1. This submission satisfies the data requirements as specified in 40 CFR 158.320, 158.325, 158.330, 158.340, 158.345, 158.350, and 158.355 with respect to product identity and composition, description of materials used to produce the product, description of production process, discussion of formation of impurities, preliminary analysis, certified limits, and enforcement analytical method.
- 2. The five batch analysis supports the composition shown on the CSF for basic formulation. The mean purity of Diflubenzuron Technical NC was measured at 98.6% w/w with a range from 98.6 to 98.8% w/w is in support of the label claim nominal concentration of 98.6%.
- 3. The registrant declared unidentified impurities at <0.1% to be of no of toxicological concern. identified also appears on other registered diflubenzuron technical product and is structurally related to diflubenzuron is of no toxicological concerns.
- 4. This submission satisfies the remaining data requirements as specified in 40 CFR 58.310 with respect to physical and chemical properties.
- 5. The product chemistry data requirements have been satisfied with the exception of the corrosion characteristics data that was not submitted.
- 6. The basic CSF dated July 31, 2013 for is acceptable.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

December 16, 2013

SIMILARITY CLINIC MEMORANDUM:

Name of Pesticide Product: Diflubenzuron Technical Subject:

EPA File Symbol:

88602-E

DP Barcode:

416337

Decision #:

484943

Action Code:

R334

PC Code:

108201 Diflubenzuron

From:

Tracy Keigwin, Biologist

Technical Review Branch

hay hegue Registration Division (7505P)

To:

Venus Eagle, RM 01

Insecticide-Rodenticide Branch Registration Division (7505P)

Applicant:

Prodigy Technical Holdings, LLC

2813 Downing St.

Flower Mound, TX 75028

FORMULATION FROM EPA File Symbol 88602-E LABEL:

Active Ingredient(s):

% by wt.

Diflubenzuron

98.6

Other Ingredient(s):

<u>1.4</u>

Total: 100.0%

BACKGROUND: Prodigy Technical Holdings, LLC has submitted an application for the registration of EPA File Symbol 88602-E, Diflubenzuron Technical (98.6% ai). The registrant has claimed similarity to EPA Reg. No. 400-467, Diflubenzuron Technical (97.9% ai). In support of their submission Prodigy Technical Holdings LLC is citing the following acute toxicity data: MRIDs 00157103 (870.1100), 00157104 (870.1200), 00163311 (870.1300), 00157105 (870.2400), 00157106 (870.2500) and 42251101 (870.2600). The cited studies have been previously reviewed and found acceptable (Ritter, 22/OCT/1986; Ritter, 31/MAR/1987; Budd, 20/JAN/1998). Of note: The test substance used for guidelines 870.1100, 870.1200, 870.1300, 870.2400 and 870.2500 contained 90.0% diflubenzuron. The test substance used for guideline 870.2600 contained 95.6% diflubenzuron.

COMMENTS AND RECOMMENDATIONS:

1) TRB does not usually accept studies containing a lower percent active ingredient to support the registration of a product containing a higher percent active ingredient. However, review of the cited studies does not show any acute toxicity categories that were borderline to a more stringent category. The slight increase in active ingredient of the proposed product should not change the toxicity from the cited studies. In addition, many of these cited studies are older. TRB is categorizing EPA File Symbol 88602-E according to current guidelines. The acute toxicity profile for EPA File Symbol 88602-E, Diflubenzuron Technical is as follows:

acute oral toxicity	IV	Cited	MRID 00157103
acute dermal toxicity	10	Cited	MRID 00157104
acute inhalation toxicity	IV	Cited	MRID 00163311
primary eye irritation	111	Cited	MRID 00157105
primary skin irritation	IV	Cited	MRID 00157106
dermal sensitization	No	Cited	MRID 42251101

- The product chemistry team must approve the proposed Basic Formulation (dated July 31, 2013) before this action can be finalized.
- 3) This product is Category III for primary eye irritation. The registrant must add the appropriate precautionary language and first aid statements to the product label. Please see the correct language (below).
- 4) The following are the precautionary and first aid statements for this product, as obtained from the Label Review System:

PRODUCT ID #:

88602-E (88602-2)

PRODUCT NAME:

Diflubenzuron Technical

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes, gloves and protective eyewear (if appropriate). Remove and wash contaminated clothing before reuse.

First Aid:

If on skin:

- -Take off contaminated clothing.
- -Rinse skin immediately with plenty of water for 15-20 minutes.
- -Call a poison control center or doctor for treatment advice.

If in eyes:

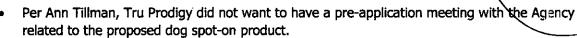
- -Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- -Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- -Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

PRIA Processing Timelines

Diflubenzuron Technical (EPA File Symbol 88602-E) &

VetGuard PRO Topical Solution for Dogs (EPA File Symbol 89609-R)



Application for an unregistered technical source of diffubenzuron (Diffubenzuron Technical; EPA File Symbol 88602-E) was submitted as an R334 on 09-23-2013 (pin-punched on 09-23-2013).

- Application for a new spot-on product for dogs (VetGuard PRO Topical Solution for Dogs; EPA File Symbol 89609-R) was submitted as an R334 on 02-18-2014 (pin-punched on 02-21-2014).
 - RD/IB first received the Jacket from Front End on 03-13-2014, which was the actual conclusion date for the initial 21-day screening period, and started processing the application.

Proposed dog spot-on product contains fipronil, permethrin and diflubenzuron. Diflubenzuron is currently registered ONLY for use in termite baits and on livestock/agricultural crops.

RD/IB immediately noticed that the inclusion of diflubenzuron in this formulation is considered to be a new use since diflubenzuron has never been assessed by HED for indoor residential (pet spot-on product) use.

- RD/IB and Steve Schaible have talked with Ann Tillman numerous times about what Tru Prodigy wanted to do before we advised her about the PRIA committee's decision to recode the end-use product application to an R260 because of the new indoor residential (pet spot-on) use for Tru Prodigy's unregistered source of diflubenzuron.
- On 04-01-2014, RD/IB sent out a 90-day deficiency letter noting all of the deficiencies found during the preliminary technical screen for the EUP application, including an explanation about the need to recode the application to an R260 to move forward with this application and to allow HED to assess the new indoor residential (pet spot-on) use for Tru Prodigy's unregistered source of diflubenzuron.
- On 04-15-2014, RD/IB teleconferenced with Ann Tillman to discuss Tru Prodigy's intended response to the 90-day deficiency letter. Within their response, Tru Prodigy agreed to the R260 recode and had already paid the additional PRIA fee, even before submitting their response.
- On 04-23-2014, per Steve Schaible's direction, Mick Yanchulis created a 2nd decision (R260) under the pending EUP application to reflect that the dog spot-on use on the proposed EUP label represents a new use for Tru Prodigy's unregistered source of diflubenzuron. As such, please note the following:
 - The pin-punch information on the new R260 decision matches the dates of the original R334 EUP registration application.
 - The PRIA conclusion dates for both the R334 EUP application and IRB's R334 diflubenzuron technical product application were extended to match the PRIA conclusion date for the R260 (05-05-2015)
 - The PRIA conclusion dates had to be extended for both of the R334's in order to match the R260 conclusion date since the new use could not be approved on either the technical or EUP product labels until the new indoor residential (pet spot-on) use has been assessed by HED.
- On 05-01-2014, RD/IB BEANed out all data packages to the RD/TRB teams, RD/IB efficacy, and also to HED/RAB4 for completion of a 90-day screen for the recoded EUP application.
- A 90-day screening meeting is scheduled for 06-25-2014 with the team in order to note any/all additional and/or remaining deficiencies.



June 20, 2014

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Jim Rathvon and Cristen Rose of Paley Rothman are authorized to act as agent for Tru Prodigy, LLC (EPA Company Number 88966), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Steven Anderson

Director Product Development



June 20, 2014

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Jim Rathvon and Cristen Rose of Paley Rothman are authorized to act as agent for TruRx, LLC (EPA Company Number 89609), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Steven Anderson

President

Prodigy Technical Holdings

June 20, 2014

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Jim Rathvon and Cristen Rose of Paley Rothman are authorized to act as agents for Prodigy Technical Holdings, LLC (EPA Company Number 88602), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Steven Anderson Vice President Federal Register/Vol. 79, No. 80/Friday, April 25, 2011/Notices

On December 2, 2013, EPA received a letter from NRG Reliability Solutions requesting an administrative permit amendment to its title V operating permit to change the location where records required by the permit are kept and to add insignificant emission units that were omitted from the permit's application during the permit renewal process. EPA determined that the requested changes to the permit did not qualify for an administrative permit amendment since 40 CFR 71.7(d)(1) did not authorize the use of an administrative permit amendment for some of the requested revisions. EPA directed NRG Reliability Solutions to submit an application for the requested revisions pursuant to the minor permit modification requirements at 40 CFR

On January 8, 2014, EPA received a minor permit modification application requesting revisions to the permit originally requested in the December 2, 2013, letter. In addition to the revisions identified in the December 2, 2013, letter, NRG Reliability Solutions also requested the correction of a typographical error in one of the permit's conditions.

EPA processed the minor permit modification application according to the regulations governing minor permit modification requirements at 40 CFR 71.7(e). EPA determined that the requested revisions to the title V operating permit satisfied the criteria at 40 CFR 71.7(e)(1)(i). EPA also determined that the application submitted by NRG Reliability Solutions satisfied the minor permit modification application requirements at 40 CFR 71.7(e)(1)(ii). On January 22, 2014, EPA sent letters to the Prairie Island Indian Community, the state of Wisconsin, and the state of Minnesota notifying each affected entity that EPA received a complete minor permit modification application as required by 40 CFR 71.7(e)(1)(iii), 40 CFR 71.8(a), and 40 CFR 71.8(d). Pursuant to 40 CFR 71.11, EPA did not issue a public notice beyond notifying affected states or tribes or provide a public comment period for this permit action because the action is a minor permit modification.

EPA issued a final minor permit modification, permit number V-PI-2704900084-2012-12, on March 6, 2014, in accordance with 40 CFR 71.7(e)(1)(iv). A copy of the final minor permit modification was sent to NRG Reliability Solutions on March 12, 2014.

B. What is the purpose of this notice?

EPA is notifying the public of the issuance of a minor modification to a title V operating permit, permit number

V-PI-2704900084-2012-12, issued to NRG Reliability Solutions, LLC, on March 6, 2014. The permit became effective on March 6, 2014.

Authority: 42 U.S.C. 7401 et seq.

Dated: April 10, 2014.

Susan Hedman,

Regional Administrator, Region 5.

[FR Doc. 2014–09459 Filed 4–24–14; 8:45 am]

BILLING CODE 6560–50–P

ENVIRONMENTAL PROTECTION AGENCY

[EPA-HQ-OPP-2014-0011; FRL-9907-63]

Pesticide Product Registration; Receipt of Applications for New Uses

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice.

SUMMARY: EPA has received applications to register new uses for pesticide products containing currently registered active ingredients. Pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), EPA is hereby providing notice of receipt and opportunity to comment on these applications.

DATES: Comments must be received on or before May 27, 2014.

ADDRESSES: Submit your comments, identified by docket identification (ID) number and the EPA Registration Number of interest as shown in the body of this document, by one of the following methods:

• Federal eRulemaking Portal: http://www.regulations.gov. Follow the online instructions for submitting comments. Do not submit electronically any information you consider to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute.

 Mail: OPP Docket, Environmental Protection Agency Docket Center (EPA/DC), (28221T), 1200 Pennsylvania Ave. NW., Washington, DC 20460-0001.

• Hand Delivery: To make special arrangements for hand delivery or delivery of boxed information, please follow the instructions at http://www.epa.gov/dockets/contacts.html.

Additional instructions on commenting or visiting the docket, along with more information about dockets generally, is available at http://www.epa.gov/dockets.

FOR FURTHER INFORMATION CONTACT: Lois Rossi, Registration Division (7505P), Office of Pesticide Programs, Environmental Protection Agency, 1200 Pennsylvania Ave. NW., Washington, DC 20460-0001; telephone number: (703) 305-7090; email address: RDFRNotices@epa.gov.

SUPPLEMENTARY INFORMATION:

I. General Information

A. Does this action apply to me?

You may be potentially affected by this action if you are an agricultural producer, food manufacturer, or pesticide manufacturer. The following list of North American Industrial Classification System (NAICS) codes is not intended to be exhaustive, but rather provides a guide to help readers determine whether this document applies to them. Potentially affected entities may include:

- Crop production (NAICS code 111).
- Animal production (NAICS code 112).
- Food manufacturing (NAICS code 311).
- Pesticide manufacturing (NAICS code 32532).
- B. What should I consider as I prepare my comments for EPA?
- 1. Submitting CBI. Do not submit this information to EPA through regulations.gov or email. Clearly mark the part or all of the information that you claim to be CBI. For CBI information in a disk or CD-ROM that you mail to EPA, mark the outside of the disk or CD-ROM as CBI and then identify electronically within the disk or CD-ROM the specific information that is claimed as CBI. In addition to one complete version of the comment that includes information claimed as CBI, a copy of the comment that does not contain the information claimed as CBI must be submitted for inclusion in the public docket. Information so marked will not be disclosed except in accordance with procedures set forth in 40 CFR part 2.
- 2. Tips for preparing your comments. When submitting comments, remember to:

i. Identify the document by docket ID number and other identifying information (subject heading, Federal Register date and page number).

ii. Follow directions. The Agency may ask you to respond to specific questions or organize comments by referencing a Code of Federal Regulations (CFR) part or section number.

iii. Explain why you agree or disagree; suggest alternatives and substitute language for your requested changes.

iv. Describe any assumptions and provide any technical information and/ or data that you used.

v. If you estimate potential costs or burdens, explain how you arrived at your estimate in sufficient detail to allow for it to be reproduced.

vi. Provide specific examples to illustrate your concerns and suggest alternatives.

vii. Explain your views as clearly as possible, avoiding the use of profanity or personal threats.

viii. Make sure to submit your comments by the comment period deadline identified.

II. Registration Applications

EPA has received applications to register pesticide products containing active ingredients not included in any previously registered pesticide products. Pursuant to the provisions of FIFRA section 3(c)(4), EPA is hereby providing notice of receipt and opportunity to comment on these applications. Notice of receipt of these applications does not imply a decision by the Agency on these applications.

1. EPA Registration Numbers: 100–936, 100–1276, 100–1458. Docket ID Number: EPA-HQ-OPP-2013–0758. Applicant: Syngenta Crop Protection, LLC, P.O. Box 18300, Greensboro, NC 27419. Active Ingredient: Thiamethoxam. Product Type: Insecticide. Proposed Uses: Foliar application to alfalfa; corn (field, pop, seed, sweet); legumes; rice; small cereal grains (barley, buckwheat, oats, rye, triticale, wheat); and sunflower.

- 2. EPA Registration Numbers: 6836–107, 6836–350. Docket ID Number: EPA-HQ-OPP-2014-0110. Applicant: Lonza, Inc., 90 Boroline Road, Allendale, NJ 07401. Active Ingredient: Metaldehyde. Product Type: Mollusicide. Proposed Uses: Legume vegetable subgroups 6A and 6B; foliage of legume vegetable subgroup 7A; fruiting vegetable subgroup 8–10A; clover; ginseng; and citrus fruit group 10–10.
- 3. EPA Registration Numbers: 62719–623, 62719–625, 62719–631. Docket ID Number: EPA-HQ-OPP-2014–0156. Applicant: Dow AgroSciences, LLC, 9330 Zionsville Road, Indianapolis, IN 46268. Active Ingredient: Sulfoxaflor. Product Type: Insecticide. Proposed Uses: Alfalfa, clover and other non-grass animal feeds (crop group 18); buckwheat; cacao; corn (field, pop, seed, sweet); millet; oats; pineapple; rye; sorghum; teff; and teosinte.

4. EPA File Symbol: 88602–E. Docket ID Number: EPA–HQ–OPP–2014–0252. Applicant: Prodigy Technical Holdings, LLC, 2813 Downing St., Flower Mound, TX 75028. Active Ingredient: Diflubenzuron. Product Type: Insect growth regulator. Proposed Uses: Indoor residential, carpets; companion animal.

List of Subjects

Environmental protection, Pesticides and pest.

Dated: April 17, 2014.

Lois Rossi,

Director, Registration Division, Office of Pesticide Programs.

[FR Doc. 2014-09449 Filed 4-24-14; 8:45 am] BILLING CODE 6560-50-P

EXPORT-IMPORT BANK OF THE UNITED STATES

[Public Notice: 2014-0028]

Application for Final Commitment for a Long-Term Loan or Financial Guarantee in Excess of \$100 Million: AP088724XX

AGENCY: Export-Import Bank of the United States.

ACTION: Notice.

SUMMARY: This Notice is to inform the public, in accordance with Section 3(c)(10) of the Charter of the Export-Import Bank of the United States ("Ex-Im Bank"), that Ex-Im Bank has received an application for final commitment for a long-term loan or financial guarantee in excess of \$100 million (as calculated in accordance with Section 3(c)(10) of the Charter). Comments received within the comment period specified below will be presented to the Ex-Im Bank Board of Directors prior to final action on this Transaction.

DATES: Comments must be received on or before May 20, 2014 to be assured of consideration before final consideration of the transaction by the Board of Directors of Ex-Im Bank.

ADDRESSES: Comments may be submitted through Regulations.gov at WWW.REGULATIONS.GOV. To submit a comment, enter EIB-2014-0028 under the heading "Enter Keyword or ID" and select Search. Follow the instructions provided at the Submit a Comment screen. Please include your name, company name (if any) and EIB-2014-0028 on any attached document.

Reference: AP088724XX. Purpose And Use:

Brief description of the purpose of the transaction:

To support the export of U.S.-manufactured aircraft to Chile.

Brief non-proprietary description of the anticipated use of the items being exported:

To be used for long-haul passenger air service between Chile and destinations throughout the world.

To the extent that Ex-Im Bank is reasonably aware, the item(s) being

exported may be used to produce exports or provide services in competition with the exportation of goods or provision of services by a United States industry.

Parties:

Principal Supplier: The Boeing Company.

Obligor: LATAM Airlines Group. Guarantor(s): None. Description of Items Being Exported:

Boeing 787 aircraft.

Information on Decision: Information on the final decision for this transaction will be available in the "Summary Minutes of Meetings of Board of Directors" on http://exim.gov/newsandevents/boardmeetings/board/.

Confidential Information: Please note that this notice does not include confidential or proprietary business information; information which, if disclosed, would violate the Trade Secrets Act; or information which would jeopardize jobs in the United States by supplying information that competitors could use to compete with companies in the United States.

Cristopolis A. Dieguez,

Business Compliance Analyst, Office of the Chief Financial Officer.

[FR Doc. 2014-09455 Filed 4-24-14; 8:45 am]

FEDERAL COMMUNICATIONS COMMISSION

Information Collection Being Reviewed by the Federal Communications Commission Under Delegated Authority

AGENCY: Federal Communications Commission.

ACTION: Notice and request for comments.

SUMMARY: As part of its continuing effort to reduce paperwork burden and as required by the Paperwork Reduction Act (PRA) of 1995 (44 U.S.C. 3501-3520), the Federal Communications Commission invites the general public and other Federal agencies to take this opportunity to comment on the following information collection(s). Comments are requested concerning: whether the proposed collection of information is necessary for the proper performance of the functions of the Commission, including whether the information shall have practical utility: the accuracy of the Commission's burden estimate; ways to enhance the quality, utility, and clarity of the information collected; ways to minimize the burden of the collection of

Metzger, Autumn

From:

Gebken, Richard

Sent:

Wednesday, April 23, 2014 1:03 PM

To:

Schaible, Stephen; Metzger, Autumn; Baris, Reuben; Rodia, Carmen; Eagle, Venus

RE: notes from 4/17 meeting

From: Schaible, Stephen

Sent: Wednesday, April 23, 2014 12:56 PM

To: Metzger, Autumn; Baris, Reuben; Rodia, Carmen; Gebken, Richard; Eagle, Venus

Subject: notes from 4/17 meeting

In preparation for 1pm conference call with Ann Tillman (Pyxis) regarding the two diflubenzuron products in house, here are bulleted notes from the 4/17 internal meeting

Tech product (IRB) ANNLO CONCOL TOOK USC

Currently R334; it was decided at an RD PRIA meeting that the R260 category would not apply as there were no end use product labels submitted with the new product application. W/o end use labels, there is no way to assess use pattern for an new use, so it can't be a "new use". Should have been flagged as deficient in 90d screen, but too late for dogs

Use/sites on tech label

"companion animals"- this will have to be changed to specify "pet spot-on", to match end use label

"carpet use"- this use pattern not found on any end use labels, no use rates available to assess exposure/risk; the indoor greenhouse use on registered labels is not a residential use and there will be new risk assessments required

Path forward: remove carpet use from proposed tech label, replace "companion animals" with "pet spot-on"

End use Product (IB)

If for some reason there is not a path forward with the pending tech product currently cited as source, the registrant could theoretically switch to a registered source of tech

They could not use a registered source, as all current tech products do not the new use pattern on the tech label.

Efficacy: citing Virbac data (for permethrin/fipronil) which does not include all three a.i.'s; diflubenzuron is an IGR The only efficacy study is for the IGR component. All other arguments are for bridging of the efficacy data. & historically, we none accepted this of still do, very recently

CAS: submitting a bridging argument There is one CASS Study.

Conclusion: PM opinion that that bridging arguments for product specific data (efficacy, CAS) not often successful) Paths forward:

- 1) Tech product is corrected per guidance above, continue with review of both actions as primary/secondary relationship
- 2) End use product switches to a different tech source in event proposed new tech product is withdrawn

As far as PRIA coding and matching due dates, the registrant has paid for a second decision, R260 new use, for the pet spot on use on the EP. Once that decision is created, the R334 action on that new product, as well as the R334 on the pending tech product, will be negotiated to match the due date of the R260.

RD waiting for discussion w/registrant before creating R260.

Steve

in now as a R334 in oppin.
Pr leus mal= 8129

8 RTA = 9115/14

Metzger, Autumn

From:

Eagle, Venus

Sent:

Tuesday, March 18, 2014 8:17 AM

To:

Schaible, Stephen

Cc:

Metzger, Autumn; Baris, Reuben

Subject:

RE: diflubenzuron action

Hi Steve,

Thanks for including me in this note (although this a.i. is actually on Reuben's team at the moment). Autumn is handling this action and coincidently asked me a question about the timing extension last week. The cover letter basically stated that they were a 334 and 260, but they would take the 260 and requesedt the extra month extension (to 12 months). Autumn noted that the extra time has not been updated in OPPIN. Is this something you will handle with Mick?

Also for my benefit, why wouldn't the registrant be charged both fees (R334 and R260) since they have an unregistered source and a new use they want to add??

Thanks much,

Venus

From: Schaible, Stephen

Sent: Thursday, March 13, 2014 5:49 PM **To:** Gebken, Richard; McCall, Deborah

Cc: Eagle, Venus

Subject: diflubenzuron action

Debbie/Richard-

Heading out the door, but quick summary of phone conversation with Ann Tillman regarding 89609-R, which you gave to me to recode to R260 (from R334).

She says that there is a pending diflubenzuron tech product with Venus' team that has this use on the label, in addition to language in the transmittal document explaining the dilemma between the R334 category (11 mo, \$19K) vs R260 category (12 mo, \$12K)- I recall taking this to the RD PRIA meeting for discussion. So the question is whether we want to recode the tech product to R260. If so, we would recode this also, but probably offer a discretionary refund of some sort.

Regarding deficiencies listed on Debbie's post it

- Dermal absorption study- Ann will check on that
- Virbac companion animal studies cited but under exclusive use protection- Ann says there is not a way she could
 have known that, but regardless they did submit their own CAS with the application. She will check with the
 other consultant who put together the CAS citations to see if they need to cite the Virbac data.

So this will need to get picked up next week. I'm off tomorrow.

Steve



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

September 25, 2013

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

PYXIS REGULATORY CONSULTING INC PRODIGY TECHNICAL HOLDING, LLC 4110 136TH ST. NW GIG HARBOR, WA 98332

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 23-SEP-13. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

PRIA 3 – 21 Day Content Screen Review Worksheet (EPA/OPP Use Only) September 2012

21 Day Screen Start Date: 9/23/	3 Septen	11061 2012			,
Experts In-Processing Signature:	•		Date 11/18/13	Fee Paid: Yes	
Division management contacted on issues	No	YesYes	Date		
			- / -		

EPA	Reg. Number: 88602-E EPA Receipt Date: 9/3	3/13				
Items for Review					No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type					
•	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)					
2	a) All inerts, including fragrances, approved for the proposed uses (see Footnote A) Technical Roduct					
Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)						
	Certificate and data matrix consistent			χ		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)					
	If applicable, is there a letter of Authorization for exclusive use on	iy.			·	
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					χ
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)					,
5	a) Selective Method (Fee category experts use)	yes	no		i de di	
J	b) Cite-All (Fee category experts use)	7				
	c) Applicant owns all data (Fee category experts use)					
6	6 5 Copies of <u>Label (Electronic labels on CD</u> are encouraged and guidance is available)					
7	Purposely left Want. Is the data package consistent with PR Notice 86-5 Data Wasn't aware					X
8	Notice of Filing included with petitions					Y

9	If applicable for conventional applications, reduced risk rationale	:	Х
	Required Data and/or data waivers. See Footnote C.		
	a) List study (or studies) not included with application		
10			
••			: !

c.	. Pho	ma	nts	, .	
U	Ш	ше	mr3	•	

All essential forms are available

Data Package hasn't arrived at our end f

Jacket approved. Jacket carre in late and was processed accordingly.

A.I + % Comp + Category added.

1K 703-347-85-18.

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are strongly encouraged to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency even if a product is currently registered by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

- 1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
- 2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
- 3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
- 4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

- 1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

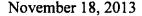
- 1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
- 3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

- B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.
- C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.







OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

OPP Decision Number: D-484943

EPA File Symbol or Registration Number: 88602-E Product Name: DIFLUBENZURON TECHNICAL

EPA Receipt Date: 23-Sep-2013 EPA Company Number: 88602

Company Name: PRODIGY TECHNICAL HOLDING, LLC

ANN TILLMAN
PYXIS REGULATORY CONSULTING INC
PRODIGY TECHNICAL HOLDING, LLC
4110 136TH ST. NW
GIG HARBOR, WA 98332-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R334

NEW PRODUCT; MUP OR END USE PRODUCT WITH UNREGISTERED SOURCE OF THE ACTIVE INGREDIENT; REQUIRES SCIENCE DATA REVIEW; NEW PHYSICAL FORM; SELECTIVE DATA CITATION;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

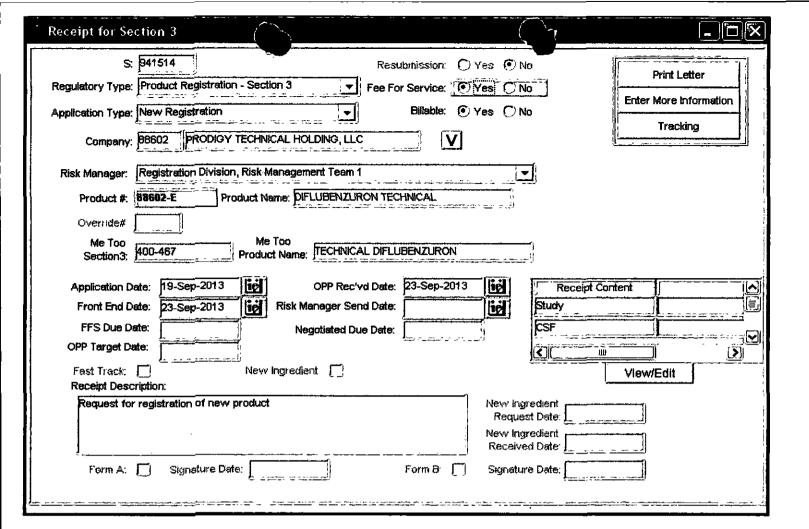
Front End Processing Staff

Information Technology & Resources Management Division

Fee for Service

{941514Ç~

This package includes the following	for Division				
New RegistrationAmendment	○ AD ○ BPPD ○ RD				
Studies? □ Fee Waiver?□ volpay % Reduction:	Risk Mgr. 7				
Receipt No. S-	941514				
EPA File Symbol/Reg. No.	88602-E				
Pin-Punch Date:	9/23/2013				
This item is NOT subject to	o FFS action.				
Action Code:	Parent/Child Decisions:				
Requested:					
Granted: 4260 p.334					
Amount Due: \$					
Inert Cleared for Intended Use	Uncleared Inert in Product				
Reviewer: $46ARVIE$ Date: $9/25/13$					
Remarks: De Attograph attached note					



Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact Pay.gov Customer Service by phone at (800) 624-1373 or by email at pay.gov.clev@clev.frb.org.

Application Name: PRIA Service Fees Pay.gov Tracking ID: 25CE3UIQ Agency Tracking ID: 74505648731

Transaction Type: Sale

Transaction Date: Sep 19, 2013 1:09:10 PM

Account Holder Name: Thomas E Stevenson

Transaction Amount: \$17,993.00
Billing Address: 36 N Morningside Way

City: Boise

State/Province: ID Zip/Postal Code: 83702

Country: USA

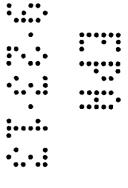
Card Type: MasterCard

Card Number: **********0560

Decision Number: Registration Number:

Company Name: Prodigy Technical Holding Company Number: 88602 Action Code: R334R260

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Please read instructions on r					Form Ap	Drov.			O. Approval expires 2-28-8
⊕EPA	Environmenta	Inited States I Protection Ington, DC 204	_	ency			Registration Amendment Other		
		Application	n for F	estic	de - Sec	tion	l		
Company/Product Number Prodigy Technical Hold				2. EPA Product Manager J. Hebert				3, Pi	roposed Classification
• •	Company/Product (Name) Prodigy Technical Holdings, LLC/Diflubenzuron Technical			PM#		07			
5. Name and Address of App Prodigy Technical Holding 4110 136th St. NW Gig Harbor, WA 98332			ting Inc.	(b)(i), r		is sim	ilar or ident		FIFRA Section 3(c)(3) imposition and labeling
Check if this	is a new address			Produ	ıct Name	Techi	nical Diflub	enzuron	• ••
			Sec	ion -					****
Amendment - Explain					Agency let	ter dat		to	
Resubmission in response to Agency letter dated Notification - Explain below.				— ✓ "Me Too" Application. Other - Explain below.			••••		
ingredient; selective da	ta citation). The P	KIA 166 WNIC	on nas de	en pai	9,717 el D	3.			
	·		Sect	ion - l	<u> </u>				
1. Material This Product Will	Be Packaged In:								
Child-Resistent Packaging Yes No Cartification must	Unit Packaging Yes No If "Yes" Unit Packaging wgt.	No. per		Yes No	Packaging No. per		2. Type of	Metal Plastic Glass Paper	lined fiber drum Specify)
be submitted	<u> </u>				1				
3. Location of Net Contents	Information ontainer	4. Size(s) Ret	tail Contair 25 I				cation of Lab On Labeling	el Direction accompany	
6. Manner in Which Label is	Affixed to Product	Lithog Paper Stenci	raph glued led		Othe	r —			
<u></u>			Secti	on - I	V				
1. Contact Point (Complete	items directly below (or identificatio	n of indivi	dual to b	e contected,	if nec	essary, to pr	ocess this	epplication.)
Name Ann M. Tillman			Title Agent					~	e No. (Include Area Code) 53-7369
I certify that the state acknowledge that an both under applicable	y knowlinglly false or		all attach						6. Date Application Received (Stamped)

3. Title

5. Date

9/19/13

Agent

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsciete.

ann to Tallen

2. Signature

4. Typed Neme

Ann M. Tillman

White - EPA File Copy (original)

4110 136th St. NW Gig Harbor, WA 98332

Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

September 19, 2013

OVERNIGHT DELIVERY

John Hebert (PM 07)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: Prodigy Technical Holdings, LLC

Diflubenzuron Technical (EPA File Symbol 88602-)

Application for New Pesticide Registration

PRIA Category R334 and/or R260

Dear Mr. Hebert,

On behalf of Prodigy Technical Holdings, LLC, we are submitting an application for registration of Diflubenzuron Technical. In support of this application, we submit the following documents:

- 1. Application for a New Pesticide Registration (EPA Form 8570-1)
- 2. Confidential Statement of Formula (EPA Form 8570-4)
- 3. Three (3) Copies of the Proposed Labeling for Diflubenzuron Technical and the draft label of the end-use product
- 4. A CD containing an electronic version of the label
- 5. Certification with Respect to Label Integrity
- 6. Agency Internal Use Copy of the Data Matrix
- 7. Public File Copy of the Data Matrix
- 8. Certification with Respect to Citation of Data (EPA Form 8570-34)
- 9. Copy of the PRIA payment from pay.gov
- 10. Letter of Authorization
- 11. Product Specific Data (3 copies each):

Volume 1 49220701	830.1550, 830.1600, 830.1620, 830.1670, 830.1750, 830.1800	Tillman, A. M. Product Identity and Composition, Description of the Materials Used, Description of the Production Process, Discussion of the Formation of Impurities, Certified Limits, and Enforcement Analytical Method for Diflubenzuron Technical. Contains Confidential Business Information.
Volume 2 49220702	830.1700, 830.1800	Li, H. Preliminary Analysis and Enforcement Analytical Method of Diflubenzuron TGAI - Validation of Analytical Methodology for the Assay of Related Significant Impurities and Subsequent 5-Batch Analysis of Diflubenzuron TGAI. Contains Confidential Business Information.

Volume 3 49220703	830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.7000, 830.7050, 830.7200, 830.7300, 830.7370, 830.7570, 830.7840	Li, H. Chemical and Physical Characterization of Diflubenzuron TGAI: Color, Physical State, Odor, Stability, Oxidation/Reduction, pH, UV-Vis, Melting Point, Density, Dissociation Constant, Partition Coefficient and Solubility.
Volume 4 49220704	830.6315, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7100, 830.7220,	Tillman, A. M. Diflubenzuron Technical Waiver Request for Physical and Chemical Properties.
	830.7520, 830.7950	· · · · ·

This application for registration is for an unregistered source of active ingredient using the selective method of support (R334). However, the proposed label includes only residential, non-food indoor uses, which is a new indoor, non-food use under PRIA category R260¹. We believe that this action falls under both PRIA categories R334 and R260. Prodigy Technical Holdings, LLC will pay the higher of the two fees (\$17,993) and agree to the longer review time (12 months) for this action.

A copy of the draft label for the end use product that will use this source of diflubenzuron is enclosed to assist EPA in considering this new use pattern. An application for registration of this end use product will be submitted by a different company once all of the studies are completed. Please keep in mind that the label is in draft form and subject to change once all of the data have been developed. However, we believe that the label, as it is currently drafted, provides the Agency with sufficient detail as to how the product is proposed to be used. Because there are two separate companies involved in these registrations, we have not submitted the applications jointly.

We trust you will find this application complete. However, please feel free to contact me by email at Ann@PyxisRC.com or by phone ((253) 853-7369) if you have any questions or need any additional information.

Sincerely,

Ann M. Tillman

Enclosures

¹ Diflubenzuron is registered for residential outdoor uses and for non-food uses as found on the approved technical label for EPA Reg. No. 400-488 but this application includes the first use of diflubenzuron as a companion animal product.



May 23, 2011

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Prodigy Technical Holdings, LLC (EPA Company Number PENDING), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

William R. Marciniak

President

Prodigy Technical Holdings, LLC

William J. Maramake

cc: Pyxis Regulatory Consulting, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration

and 0.25 hours per response for reregistration and special review activities, including comments regarding burden estimate or any other aspect of this collection of Information Management Division (2137), U.S. Environmental Protection Agency, 40 Do not send the completed form to this address.	ition, including sugge	estions for reducing the burden to: Director, OPPE
Certification with Respec	t to Citation of	Data
Fi-pilicant's/Registrant's Name, Address, and Telephone Number Prodigy Technical Holdings, LLC c'o Pyxis Regulatory Consulting Inc., 4110 136th St NW, Gig Harbor WA (20	53)853-7369	EPA Registration Number/File Symbol 88602-
Active Ingredient(s) and/or representative test compound(s) Diffubenzuron		Date 9/19/13
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 TGAI	3)	Product Name Diflubenzuron Technical
NOTE: If your product is a 100% repackaging of another purchased EPA-register submit this form. You must submit the Formulator's Exemption Statement (EPA Formulator's Exemption Statement)		or all the same uses on your label, you do not need to
I am responding to a Data-Call-in Notice, and have included with this form a be used for this purpose).	list of companies se	nt offers of compensation (the Data Matrix form should
SECTION I: METHOD OF DATA SUP	PORT (Check one m	ethod only)
I am using the cite-all method of support, and have included with this form a list of compenies sent offers of compensation (the Data Matrix form should be used for this purpose).	g the selective method of support (or cite-all option selective method), and have included with this form a d list of data requirements (the Data Matrix form must be	
SECTION II: GENERAL	OFFER TO PAY	
[Required if using the cite-all method or when using the cite-all option under the selection is thereby offer and agree to pay compensation, to other persons, with regard to		
SECTION III: CERT	TIFICATION	
I certify that this application for registration, this form for reregistration, or the para-Call-in response. In application for registration, it is application in the Data-Call-in response. In indicated in Section I, this application is supported by all data in the Agency's files the substantially similar product, or one or more of the Ingredients in this product; and (2) togularments in effect on the date of approval of this application if the application sou uses.	n addition, if the cite- at (1) concern the pro at s a type of data that	all option or cite-all option under the selective method is operties or effects of this product or an identical or t would be required to be submitted under the data
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	n or reregistration, th	at I am the original data submitter or that have obtained .
I certify that for each study cited in support of this registration or reregistrat submitter; (b) I have obtained the permission of the original data submitter to use the compensation have expired for the study; (d) the study is in the public literature; or (e) offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(amount and terms of compensation, if any, to be paid for the use of the study.	study in support of to I have notified in wr	his application; (c) all periods of eligibility for iting the company that submitted the study and have
I certify that in all instances where an offer of compensation is required, co accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will evidence to the Agency upon request, I understand that the Agency may initiate action FIFRA.	be submitted to the	Agency upon request. Should I fail to produce such - • • 🖟 •
I certify that the statements I have made on this form and all attachn kswingly false or misleading statement may be punishable by fine or imprise	nents to it are true, onment or both und	accurate, and complete. I acknowledge that any ier applicable law.
Signature ann Tiller	Date 9/19/13	Typed or Printed Name and Title Ann M. Tillman, Agent

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

	DATA M	IATRIX			
Date Sept. 19, 2013		EPA Reg. No./File Symbol 88602-		Page of 7	
Applicant's/Registrant's Name & Address Prodigy Technical Holdings, LLC 2813 Downing St. Flower Mound, TX 75028		Product Diffubenzuron Technical			
Ingredient Diflubenzuron (CAS No.	· · · · · · · · · · · · · · · · · · ·				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Re	quirements				
830.1550	Product Identity and Composition	Volume 1	Prodigy Technical Holdings, LLC	OWN	
830.1600	Description of Materials Used to Produce the Product	Volume 1	Prodigy Technical Holdings, LLC	OWN	
830.1620	Description of Production Process	Volume 1	Prodigy Technical Holdings, LLC	OWN	
830.1650	Description of Formulation Process				Not required ¹
830.1670	Discussion of Formation of Impurities	Volume 1	Prodigy Technical Holdings, LLC	OWN	
830.1700	Preliminary Analysis	Volume 2	Prodigy Technical Holdings, LLC	OWN	
830.1750	Certified Limits	Volume 1	Prodigy Technical Holdings, LLC	OWN	
830.1800	Enforcement Analytical Method	Volume 1	Prodigy Technical Holdings, LLC	OWN	-
		Volume 2	Prodigy Technical Holdings, LLC	OWN	
830.6302	Color	Volume 3	Prodigy Technical Holdings, LLC	OWN	
830.6303	Physical State	Volume 3	Prodigy Technical Holdings, LLC	OWN	
830.6304	Odor	Volume 3	Prodigy Technical Holdings, LLC	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	Volume 3	Prodigy Technical Holdings, LLC	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility	Volume 3	Prodigy Technical Holdings, LLC	OWN	
830.6315	Plammability	Volume 4	Prodigy Technical Holdings, LLC	OWN	Waiver ²
Signature			Name and Title		Date
am m. Jeller	• • • • • • •		Ann M. Tillman, Consultant		Sept. 19, 2013

DATA MATRIX						
Date Sept. 19, 2013			EPA Reg. No./File Symbol 88602-	Page 2 of 7		
Applicant's/Registrant's Name & Address Prodigy Technical Holdings, LLC 2813 Downing St. Flower Mound, TX 75028		Product Diflubenzuron Technical				
Ingredient Diflubenzuron (CAS No. 3	5367-38-5)		•			
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
830.6316	Explodability	Volume 4	Prodigy Technical Holdings, LLC	OWN	Waiver ³	
830.6317	Storage Stability	Volume 4	Prodigy Technical Holdings, LLC	OWN	PRN 92-5⁴	
830.6319	Miscibility				Not required ⁵	
830.6320	Corrosion Characteristics	Volume 4	Prodigy Technical Holdings, LLC	OWN	PRN 92-5⁴	
830.6321	Dielectric Breakdown Voltage				Not required ⁶	
830.7000	pH	Volume 3	Prodigy Technical Holdings, LLC	OWN		
830.7050	UV/Visible Absorption	Volume 3	Prodigy Technical Holdings, LLC	OWN		
830.7100	Viscosity				Not required ⁷	
830.7200	Melting Point/Melting Range	Volume 3	Prodigy Technical Holdings, LLC	OWN		
830.7220	Boiling Point/Boiling Range		1		Not required ⁸	
830.7300	Density/Relative Density/Bulk Density	Volume 3	Prodigy Technical Holdings, LLC	OWN		
830.7370	Dissociation Constants in Water	Volume 3	Prodigy Technical Holdings, LLC	OWN		
830.7520	Particle size, fiber length, diameter distribution	Volume 4	Prodigy Technical Holdings, LLC	OWN	Waiver ⁹	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				See 830.7570	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				See 830.7570	
830.7570	Rantition Coefficient (n-octanol/water), Estimation by Liquid Chromatography	Volume 3	Prodigy Technical Holdings, LLC	OWN		
Signature	*** * *		Name and Title		Date	
am M. Tiller			Ann M. Tillman, Consultant		Sept. 19, 2013	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

	DATA	MATRIX			
Date Sept. 19, 2013			EPA Reg. No./File Symbol 88602-	Page-3of 7	
Applicant's/Registrant's Name & Address Prodigy Technical Holdings, LLC 2813 Downing St. Flower Mound, TX 75028		Product Diflubenzuron Technical			
Ingredient Diflubenzuron (CAS No.	35367-38-5)			_	
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	Volume 3	Prodigy Technical Holdings, LLC	OWN	
830.7860	Water Solubility, Generator Column Method				See 830.7840
830.7950	Vapor Pressure	Volume 4	Prodigy Technical Holdings, LLC	PL	
870.1100	Acute Oral Toxicity: Rat	00157103		OLD	See endnote ¹⁰
870.1200	Acute Dermal Toxicity: Rat	00157104		OLD	See endnote ¹¹
870.1300	Acute Inhalation Toxicity: Rat	00163311		OLD	See endnote ¹²
870.2400	Primary Eye Irritation: Rabbit	00157105		OLD	See endnote ¹³
870.2500	Primary Dermal Irritation	00157106		OLD	See endnote ¹⁴
870.2600	Dermal Sensitization	42251101		OLD	See endnote ¹⁵
Generic Data Requiremen					
850.2100	Acute Avian Oral Toxicity				Not required 16
850.1075	Fish Toxicity	00056150		OLD	See endnote ¹⁷
850.1010	Freshwater Invertebrate Toxicity	43665801		OLD	See endnote ¹⁸
		40840502		OLD	
Signature			Name and Title	<u> </u>	Date
am m. Teller	• • • • • • • • • • • • • • • • • • • •		Ann M. Tillman, Consultant		Sept. 19, 2013

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

	DA1	TA MATRIX			
Date Sept. 19, 2013			EPA Reg. No./File Symbol 88602-	Page 4of 7	
Applicant's/Registrant's Name & Address Prodigy Technical Holdings, LLC 2813 Downing St.		Product Diflubenzuron Technical			
Ingredient Diflubenzuron (CAS No.	Flower Mound, TX 75028				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.6200	Acute Neurotoxicity (Rat)				Not required ¹⁹
870.3100	90-Day Oral Toxicity in Rodents	00099713		OLD	See endnote ²⁰
	,	00070018		OLD	
		00064550		OLD	
		00074534	lxe	OLD	
		00074534	PS/100,	OLD	
		00114330		OLD	
870.3150	90-Day Oral Toxicity in Non-Rodents	00038706		OLD	See endnote ²
870.3200	21-Day Dermal Toxicity				Not required
870.3250	90-Day Dermal Toxicity	00038716		OLD	See endnote ²²
		43854101		OLD	
870.3465	90-Day Inhalation Toxicity	44950601	Chemtura Corporation	PAY	See endnote ²³
870.6100	28-Day Delayed Neurotoxicity - Hen				Not required
870.6200	90-Day Subchronic Neurotoxicity -Rat				Not required 19
870.4100	Chronic Toxicity Rat	00044329		OLD	See endnote ²⁴
	,	00099712		OLD	
		00145467		OLD	
• •		00142490		OLD	
Signature			Name and Title		Date
am M. Jellen			Ann M. Tillman, Consultant		Sept. 19, 2013

	DATA	MATRIX			
Date Sept. 19, 2013 Applicant's/Registrant's Name & Address Prodigy Technical Holdings, LLC 2813 Downing St. Flower Mound, TX 75028		EPA Reg. No./File Symbol 88602-		Page 5 of 7	
		Product Diffubenzuron Technical			
Ingredient Diflubenzuron (CAS No.	35367-38-5)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.4200	Carcinogenicity	00145467		OLD	See endnote ²⁵
		00142190		OLD	
870.3700	Prenatal Development Toxicity Studies	41703504		OLD	See endnote ²⁶
		41703505		OLD	
870.3800	Reproduction and Fertility Effects	43578301		OLD	See endnote ²⁷
870.6300	Developmental Neurotoxicity Study				Not required
870.5100	Bacterial Reverse Mutation Test	41703503		OLD	See endnote ²⁸
870.5300, 870.5375	In vitro Mammalian Cell Gene Mutation Test	41703502		OLD	See endnote ²⁹
870.5385, 870.5395	In vivo Cytogenetics	41703501		OLD	See endnote ³⁰
870.7200	Companion Animal Safety				Not required ³¹
870.7485	Metabolism and Pharmacokinetics	41720901		OLD	See endnote ³²
		41919001		OLD	
		44875501	Chemtura Corporation	PAY	
		44875502	Chemtura Corporation	PAY	
870.7600	Dermal Penetration				Not required
870.7800	Immunotoxicity	48760512	Chemtura Corporation	PAY	
875.1100	Dermal Outdoor Exposure				Not required
Signature			Name and Title		Date
ann m. Tellen			Ann M. Tillman, Consultant		Sept. 19, 2013

	DAT	A MATRIX			
Date Sept. 19, 2013			EPA Reg. No./File Symbol 88	602-	Page Cof 7
<u> </u>		Product Diflubenzuron Technical			
Ingredient Diflubenzuron (CAS No.	35367-38-5)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.1200	Dermal Indoor Exposure				Not required ³³
875.1300	Inhalation Outdoor Exposure				Not required
875.1400	Inhalation Indoor Exposure				Not required ³³
875.1500	Biological Monitoring				Not required ³³
875.1600	Data Reporting and Calculations				Not required ³³
875.1700	Product Use Information				Not required ³³
875.2100	Foliar Residue Dissipation				Not required
875.2200	Soil Residue Dissipation				Not required
875.2300	Indoor Surface Residue Dissipation				Not required ³³
875.2400	Dermal Passive Dosimetry Exposure				Not required ³³
875.2500	Inhalation Passive Dosimetry Exposure				Not required ³³
835.2120	Hydrolysis	00143355	-	OLD	See endnote ³⁴
		40859801		OLD	
		41087801	_	OLD	
Signature			Name and Title		Date
am m. Jellen			Ann M. Tillman, Consul	tant	Sept. 19, 2013

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

send the form to this address.	<u>. </u>					
	DAT	TA MATRIX				
Date Sept. 19, 2013			EPA Reg. No./File Symbol 886	602-	Page 7 of 7	
Applicant's/Registrant's Name & Address Prodigy Technical Holdings, LLC 2813 Downing St. Flower Mound, TX 75028			Product Diflubenzuron Technical			
Ingredient Diflubenzuron (CAS No.	35367-38-5)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
860 series	Residue Chemistry Data requirements				Not required	
Signature		1	Name and Title		Date	
am M. Jellen			Ann M. Tillman, Consult	tant	Sept. 19, 2013	

Endnotes for Data Matrix for Diflubenzuron Technical

- 4 830.6317, 830.6320 Per PR Notice 92-5, storage stability and corrosion characteristics data are not required to be submitted unless specifically requested by the Agency. Prodigy Technical Holdings, LLC agrees to conduct this study if required and requests that the study be made a condition of registration
- ⁵ 830.6319 This data requirement is required when the product is an emulsifiable liquid and to be diluted with petroleum solvents. Diflubenzuron Technical is a solid technical material and therefore this data requirement is not applicable.
- ⁶ 830.6321 These data are required if the product is an end-use product. This data requirement is not applicable to Diflubenzuron Technical.
- ⁷ 830.7100 Viscosity data are required only if the product is a liquid. Diflubenzuron Technical is a solid and therefore this data requirement is not applicable.
- ⁸ 830.7200 This data requirement is not applicable to Diflubenzuron Technical because it is a solid.
- * 830.7520 Prodigy Technical Holdings, LLC is seeking a waiver for this data requirement for Diffubenzuron Technical because the product is not a fibrous material or a water-insoluble material.
- 870.1100 MRID 00157103 is cited in the Diflubenzuron RED and the 2012 Registration Review Scoping Document as satisfying this data requirement.
- ¹¹ **870.1200** MRID 00157104 is cited in the Diflubenzuron RED and the 2012 Registration Review Scoping Document as satisfying this data requirement.
- 870.1300 MRID 00163311 is cited in the Diflubenzuron RED and the 2012 Registration Review Scoping Document as satisfying this data requirement.
- ¹³ **870.2400** MRID 00157105 is cited in the Diflubenzuron RED and the 2012 Registration Review Scoping Document as satisfying this data requirement.
- 870.2500 MRID 00157106 is cited in the Diflubenzuron RED and the 2012 Registration Review Scoping Document as satisfying this data requirement.
- 870.2600 MRID 42251101 is cited in the Diflubenzuron RED and the 2012 Registration Review Scoping Document as satisfying this data requirement.
- 850.2100 40 CFR 158.630(e)(2) states that these data are not required for liquid formulations for indoor uses. Diflubenzuron Technical is labeled for formulation into liquid indoor uses only. Therefore, these data are not required.
- ¹⁷ 850.1075 40 CFR 158.630(e)(8) states that only one species (coldwater or warmwater) are required for indoor uses. Diflubenzuron Technical is labeled for formulation into indoor uses only. MRID 00056150 is cited in the Diflubenzuron RED and the 2012 Registration Review Problem Formulation as satisfying this data requirement.
- 850.1015 40 CFR 158.630(e)(9) states that end-use product data are not required unless certain conditions are met. Because Diflubenzuron Technical is labeled for formulation into indoor uses only, these conditions are not met and only data on the technical product is required. MRID numbers 43665801 and 40840502 are listed in the Diflubenzuron RED Scoping Document as satisfying this data requirement. MRID 45252204 was listed in the 2012 Registration Review Problem Formulation but this study was conducted with a solid end-use product.

¹ 830.1650 – These data are not required for technical grade active ingredients. Refer to 830.6320.

^{830.6315 -} Prodigy Technical Holdings, LLC requests a waiver from the requirement of this data requirement since Diflubenzuron Technical is a solid and is not expected to be flammable, and none of the components in Diflubenzuron Technical are flammable. Please refer to the Confidential Statement of Formula for Diflubenzuron Technical.

³ 830.6316 - Prodigy Technical Holdings, LLC requests a waiver from this data requirement. Diflubenzuron does not have the chemical bonds or functional groups associated with explosive chemicals.

Endnotes for Data Matrix for Diflubenzuron Technical

- 19 870.6200 According to Page 5 of the 2012 Registration Review Human Health Scoping document, HASPOC conducted a weight of the evidence approach and concluded that acute and subchronic neurotoxicity data are not required. Therefore, no data are cited.
- 20 870.3100 The studies cited were listed in the RED as satisfying the data requirement. No new data have been submitted under this data requirement and no data were required as per the 2012 Registration Review Human Health Scoping document.
- 21 870.3100 The study cited was listed in the RED as satisfying the data requirement. No new data have been submitted under this data requirement and no data were required as per the 2012 Registration Review Human Health Scoping document.
- 870.3250 No 90-day dermal toxicity data have been submitted although diflubenzuron is used indoors; this was not identified as a data gap in the 2012 Registration Review Human Health Scoping document. Therefore, 21-day dermal toxicity data, which were listed in the RED and identified as acceptable in the 2012 Registration Review Human Health Scoping document, were cited here.
- ²³ **870.3465** MRID 44950601 was identified as acceptable in the 2012 Registration Review Human Health Scoping document.
- 24 870.4100 The studies cited were listed in the RED as satisfying the data requirement. No new data have been submitted under this data requirement and no data were required as per the 2012 Registration Review Human Health Scoping document.
- 870.4200 The studies cited were listed in the RED as satisfying the data requirement. No new data have been submitted under this data requirement and no data were required as per the 2012 Registration Review Human Health Scoping document.
- 26 870.3700 The studies cited were listed in the RED as satisfying the data requirement. No new data have been submitted under this data requirement and no data were required as per the 2012 Registration Review Human Health Scoping document.
- 27 870.3800 MRID 43578301 was listed in the RED as satisfying the data requirement. No new data have been submitted under this data requirement and no data were required as per the 2012 Registration Review Human Health Scoping document.
- ²⁸ 870.5100 MRID 41703503 was listed in the RED as satisfying the data requirement. No new data have been submitted under this data requirement and no data were required as per the 2012 Registration Review Human Health Scoping document.
- ²⁹ 870.5300, 870.5395 MRID 41703502 was listed in the RED as satisfying the data requirement. No new data have been submitted under this data requirement and no data were required as per the 2012 Registration Review Human Health Scoping document.
- 870.5385, 870.5395 MRID 41703501 was listed in the RED as satisfying the data requirement. No new data have been submitted under this data requirement and no data were required as per the 2012 Registration Review Human Health Scoping document.
- ³¹ 870.3150 Companion animal safety data will be submitted or cited with the end-use product application(s).
- 870.7485 MRID numbers 41703501 and 41919001 were listed in the RED as satisfying the data requirement. Although no data were required, two additional metabolism studies were submitted and these studies were referenced in the 2012 Registration Review Human Health Scoping document as it relates to cancer classification. As such, these studies were cited.
- ³³ 875.1200, 875.1400, 875.1500, 875.1600, 875.1700, 875.2300, 875.2400, 875.2500 Although these data were required in the RED, no data for domestic uses have been submitted. In addition, page 8 of the 2012 Registration Review Human Health Scoping document states that these exposure data are not needed.

Endnotes for Data Matrix for Diflubenzuron Technical

³⁴ 835.2120 – MRID numbers 40859801 and 41087801 were listed in the RED as satisfying the data requirement. These studies, along with MRID 00143355, were listed in the 2012 Registration Review Problem Formulation as satisfying the data requirement.

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL				
EPA Registration #	Date Submitted to EPA	Electronic file name		
088602-xxxx	Sept. 19, 2013	088602-xxxxx.20130919.Diflubenzuron Technical label.pdf		

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature

Ann M. Tillman

Agent Prodigy Technical Holdings, LLC

am m. Jeller

Sept. 19, 2013 Date

